

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

**MITCHELL TODD CROWLEY and
WANDA CROWLEY,**

Plaintiffs,

V.

Civil Action No. CV-06-1090-WKW

**PATRICK THOMPSON, MID SOUTH
TRANSPORT, INC.,**

Defendants.

JOINT MOTION TO EXTEND SCHEDULING ORDER

COME NOW Plaintiffs and Defendants and jointly request that the Court extend its previously entered Scheduling Order deadlines. As grounds for this Motion, the Parties state as follows:

1. On or about January 8, 2007, this Court entered a Uniform Scheduling Order. The Scheduling Order provided the following pertinent litigation deadlines:

- | | | |
|----|--|--------------------|
| A. | Add Parties/Amend Pleadings Deadline | March 21, 2007 |
| B. | Dispositive Motion Deadline | July 31, 2007 |
| C. | Plaintiff's Expert Witness Disclosure Deadline | August 10, 2007 |
| D. | Settlement Conference Deadline | August 21, 2007 |
| E. | Defendant's Expert Witness Disclosure Deadline | August 31, 2007 |
| F. | Discovery Deadline | September 28, 2007 |
| G. | Pretrial Conference | October 29, 2007 |
| H. | Witness and Deposition Designation | October 31, 2007 |
| I. | Exhibit List Deadline | October 31, 2007 |

J. Trial is to begin during the term commencing on December 10, 2007

2. The Parties recently completed voluminous written discovery. The depositions of the parties have not been scheduled. The Parties have been attempting to resolve this dispute without incurring additional litigation expenses and have scheduled mediation for July 26, 2007, the earliest date available to the Parties and the mediator, Charles Stewart.

3. The Parties are hopeful that the upcoming mediation will result in an agreeable settlement of the case. However, if the case should fail to settle, the deadlines, expert disclosures and the remainder of discovery, which is expected to include a number of medical depositions, will be difficult to meet. Accordingly, the Parties respectfully request that the Court extend the scheduling deadlines associated with this case to allow for the completion of discovery after Mediation. This is the first extension of any deadline that either Party has requested.

WHEREFORE, premises considered, Plaintiffs Mitchell and Wanda Crowley and Defendants Patrick Thompson and Mid South respectfully request that the Court extend the scheduling deadlines associated with this case by one hundred twenty (120) days, or such other period as the Court deems appropriate.

Respectfully Submitted,

/s/ Brett A. Ross

Brett A. Ross (ASB-6771-O-76-B)
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/s/ William B. Alverson, Jr.

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